

EXHIBIT 1

Brendan Glackin (SBN 199643)
bglackin@agutah.gov
Fred Norton (SBN 224725)
fnorton@agutah.gov
David N. Sonnenreich (*pro hac vice*)
dsonnenreich@agutah.gov
Scott R. Ryther (*pro hac vice*)
sryther@agutah.gov
**UTAH OFFICE OF THE
ATTORNEY GENERAL**
160 East 300 South, Fifth Floor
P.O. Box 140874
Salt Lake City, UT 84114
Telephone: (801) 366-0375

Bryan L. Bloom (*pro hac vice*)
Bryan.Bloom@ag.ny.gov
**NEW YORK STATE OFFICE OF THE
ATTORNEY GENERAL**
28 Liberty Street
New York, NY 10005
Telephone: (212) 416-8262

Sarah G. Boyce (*pro hac vice*)
sboyce@ncdoj.gov
Jonathan Marx (*pro hac vice*)
jmarx@ncdoj.gov
Jessica V. Sutton (*pro hac vice*)
jsutton2@ncdoj.gov
**NORTH CAROLINA DEPARTMENT
OF JUSTICE**
P.O. Box 628
Raleigh, NC 27602
Telephone: (919) 716-6000

S. Ethan Bowers (*pro hac vice*)
Ethan.Bowers@ag.tn.gov
**TENNESSEE OFFICE OF THE
ATTORNEY GENERAL**
P.O. Box 20207
Nashville, TN 37202
Telephone: (615) 741-8722

Attorneys for the Plaintiff States

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

State of Utah et al. v. Google LLC et al.,
Case No. 3:21-cv-05227-JD

Case No. 3:21-md-02981

**PLAINTIFF STATES'
RESPONSES AND OBJECTIONS
TO DEFENDANTS'
PRESERVATION
INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rule 33 of the Civil Local Rules of the United States District Court for the Northern District of California, the States, Commonwealths, and Districts of Utah, New York, North Carolina, Tennessee, Arizona, Colorado, Iowa, Nebraska, Alaska, Arkansas, California, Connecticut, Delaware, District of Columbia, Florida, Idaho, Indiana, Kentucky, Louisiana, Maryland, Massachusetts, Minnesota, Mississippi, Missouri, Montana, Nevada, New Hampshire, New Jersey, New Mexico, North Dakota, Oklahoma, Oregon, Rhode Island, South Dakota, Texas, Virginia, Vermont, Washington, and West Virginia (the “Plaintiff States”), by and through their respective Attorneys General, submit these responses and objections to Defendants’ Preservation Interrogatories to Plaintiff States, dated December 22, 2021 (the “Interrogatories”).

PRELIMINARY STATEMENT

1. These responses and objections are based on information presently available to Plaintiff States and are made without prejudice to, and are not a waiver of, Plaintiff States’ right to rely on other facts or documents at trial.

2. This action was brought by Plaintiff States pursuant to their authority to enforce state and federal antitrust and consumer-protection laws. This action was not brought by any other public officials, state agencies, or governmental entities; such persons, agencies, and entities are not parties to this litigation. Plaintiff States are not seeking relief on behalf of other entities in their proprietary capacities. Plaintiff States thus have no obligation to, and do not intend to, collect and review information from any other state agencies or entities to respond to these Interrogatories, but rather will respond to the extent that responsive information is in their possession, custody, or control.

3. Any response or objection by Plaintiff States to an Interrogatory is not an acknowledgement or concession that the information sought is relevant to the claims in this action or is in Plaintiff States’ possession, custody, or control.

4. By making the accompanying responses and objections to the Interrogatories, Plaintiff States do not waive, and hereby expressly reserve, their right to assert any and all

1 objections as to the admissibility of such responses into evidence in this Action, or in any other
 2 proceedings, on any grounds, including, but not limited to, competency, relevancy, materiality,
 3 and privilege.

4 5. Plaintiff States reserve the right to supplement, clarify, revise, or correct their
 5 responses and objections to the Interrogatories. Plaintiff States further reserve the right to assert
 6 additional privileges. Where privileged information is protected by applicable state laws or
 7 rules, the fact that Plaintiff States' response does not specifically delineate a state law or rule
 8 shall not be deemed to be a waiver of that privilege.

9 GENERAL OBJECTIONS

10 1. Plaintiff States object to the Interrogatories, including the Definitions and
 11 Instructions, as being overbroad, unduly burdensome, premature and wholly without merit.
 12 While the Court suggested that Defendants could issue document preservation interrogatories to
 13 address any preservation issues that had arisen, Defendants have raised no basis whatsoever for
 14 propounding such discovery upon the Plaintiff States. Joint Status Conf. Tr., Dec. 16, 2021,
 15 7:17-18:8. These interrogatories are especially premature and burdensome, given that
 16 Defendants have only recently issued document requests upon Plaintiff States, and given that
 17 document production by Plaintiff States is far from complete.

18 2. Plaintiff States object to the Interrogatories, including the Definitions and
 19 Instructions, to the extent that they seek information that is not in Plaintiff States' possession,
 20 custody, or control. Plaintiff States will only respond to the extent that responsive information is
 21 in the possession, custody, or control of the units, departments, or subdivisions within the
 22 Offices of the Attorney General of each respective Plaintiff State that are responsible for
 23 enforcing the laws and claims asserted in this litigation. Plaintiff States will not search for,
 24 inquire about, or respond with respect to information in the possession, custody, or control of
 25 any state agency other than the units, departments, or subdivisions within the Offices of the
 26 Attorney General of each respective Plaintiff State that are responsible for enforcing the laws
 27 and claims asserted in this litigation. For those Interrogatories that seek information concerning

an App intended for consumer use that was developed by an Office of the Attorney General, Plaintiff States will respond to the extent that responsive information is in the possession, custody, or control of the unit, department, or subdivision within the Office of the Attorney General that is responsible for developing or directly overseeing the development or implementation of the Apps identified in Plaintiff States' response to Google's Interrogatory No. 3 to Plaintiff States.

3. Plaintiff States object to the Interrogatories, including the Definitions and Instructions, to the extent that they attempt to impose any obligation on Plaintiff States that is greater than or different from those imposed or authorized by the Federal Rules of Civil Procedure, the Local Civil Rules of the United States District Court for the Northern District of California, or any applicable order of the Court.

4. Plaintiff States object to the Interrogatories, including the Definitions and Instructions, to the extent that they seek information that is not relevant to this litigation nor proportional to the needs of the case. The Attorneys General of each Plaintiff State are the chief law enforcement officers of their respective States and bring this *parens patriae* action on behalf of the consumers who were harmed, directly and indirectly, by Defendants' conduct. Other agencies and municipalities located within each particular Plaintiff State are not parties to this action and are not represented in Plaintiff States' claims.¹ In light of Plaintiff States' unique position, Interrogatories that attempt to treat Plaintiff States in the same manner as private litigants are inappropriate.

5. Plaintiff States object to the Interrogatories, including the Definitions and Instructions, as overly broad and unduly burdensome to the extent that they purport to require answers to be based on "all knowledge or information." To the extent that Plaintiff States provide responses to the Interrogatories, Plaintiff States have conducted a reasonable inquiry of

¹ The Acting Attorney General of New Jersey ("Acting Attorney General") is charged with the responsibility of enforcing the New Jersey Consumer Fraud Act ("CFA"), N.J.S.A. 56:8-1 to -226. The Director of the New Jersey Division of Consumer Affairs ("Director") is charged with the responsibility of administering the CFA on behalf of the Acting Attorney General. As such, this action was initiated on behalf of the Director in addition to the Acting Attorney General.

1 those persons likely to possess information responsive hereto and have conducted a reasonable
2 search for responsive, non-privileged information within their possession, custody, and control.

3 6. Plaintiff States object to the Interrogatories, including the Definitions and
4 Instructions, to the extent that they seek information that is protected from disclosure by any
5 statute governing the confidentiality of information or by the attorney-client privilege, the
6 deliberative-process privilege, the official information privilege, the common-interest or joint-
7 prosecution privilege, the work-product doctrine, and/or any other applicable privilege. The
8 inadvertent disclosure of information subject to any privilege or protection is not intended to
9 relinquish, and shall not be deemed a waiver of, any applicable privilege or protection. In the
10 event that protected information is inadvertently produced, Plaintiff States reserve the right to
11 demand the return of any such information and all copies pursuant to Fed. R. Civ. P.
12 26(b)(5)(B).

13 7. Plaintiff States object to the Interrogatories, including the Definitions and
14 Instructions, to the extent that they request personally identifiable information or information
15 protected by any state or federal privacy provisions. Plaintiff States may redact or withhold any
16 personally identifiable information or information protected by any state or federal privacy
17 provisions.

18 8. Plaintiff States object to the Interrogatories, including the Definitions and
19 Instructions, to the extent that they seek information that is already in Defendants' or their
20 counsel's possession or that is otherwise equally available to Defendants or their counsel.

21 9. Plaintiff States object to the Interrogatories to the extent that they are duplicative
22 of one another.

23 10. Plaintiff States expressly incorporate these general objections into each response
24 below. A response may repeat any of the general objections for emphasis or otherwise. The
25 failure to repeat any of the general objections in a particular response does not waive any of
26 these objections.

11. Plaintiff States are willing to meet and confer about any of the general and specific objections made to any Interrogatory.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. Plaintiff States object to the definition of “Chats” as vague, ambiguous, overbroad, and unduly burdensome because the definition, as stated, purports to reach each and every “digital technology” that is used in real-time conversations including those well beyond the scope of this litigation.

2. Plaintiff States object to the definition of “Potential Document Custodian” as vague, ambiguous, overbroad, and unduly burdensome to the extent it applies to persons outside of units, departments, or subdivisions within the Offices of the Attorney General of each respective Plaintiff State that are responsible for enforcing the laws and claims asserted in this litigation, and to the extent it is premature for Plaintiff States to identify any custodians when the parties are continuing to engage in meet-and-confer negotiations as to the appropriate identification of Plaintiff States’ document production custodians.

3. Plaintiff States object to the definition of “Relating To” as overbroad and unduly burdensome. The definition, as stated, purports to call for information that is not relevant to any claim or defense in this matter and is not proportional to the needs of the case, given the significant burden that searching for and inquiring about responsive information would impose on Plaintiff States and the minimal utility that responsive information, if any, would offer Defendants. Plaintiff States define “relating to” to mean “directly concerning.”

4. Plaintiff States object to the definition of “You” and “Your” as vague, ambiguous, overbroad, and unduly burdensome. This action was brought by Plaintiff States pursuant to their authority to enforce state and federal antitrust and consumer-protection laws.²

² The Acting Attorney General of New Jersey (“Acting Attorney General”) is charged with the responsibility of enforcing the New Jersey Consumer Fraud Act (“CFA”), N.J.S.A. 56:8-1 to -226. The Director of the New Jersey Division of Consumer Affairs (“Director”) is charged with the responsibility of administering the CFA on behalf of the Acting Attorney General. As such, this action was initiated on behalf of the Director in addition to the Acting Attorney General. The Acting Attorney General and the Acting Director are represented by the New Jersey Division of Law in this action pursuant to N.J.S.A. 52:17A-4.

1 This action was not brought by or on behalf of any other public officials, state agencies, or
2 governmental entities; such persons, agencies, and entities are not parties to this litigation.
3 Plaintiff States are not seeking relief on behalf of any other entities in their proprietary
4 capacities. It would be unduly burdensome and unreasonable for Plaintiff States to search for,
5 inquire about, or respond with respect to information from any other state agencies or entities.
6 Plaintiff States will construe those terms to refer to the units, departments, or subdivisions
7 within the Offices of the Attorney General of each respective Plaintiff State that are responsible
8 for enforcing the laws and claims asserted in this litigation.

9 5. Plaintiff States specifically object to Instruction 15 to the extent it seeks
10 information from expert witnesses.

11 6. Plaintiff States specifically object to Instruction 16 to the extent that it prohibits
12 any reference to any other related Interrogatory. Defendants have no basis for forbidding
13 Plaintiff States from responding to these Interrogatories in the most efficient and least
14 burdensome manner.

15 7. Plaintiff States specifically object to Instruction 21 to the extent that it purports
16 to require Plaintiff States to “identify each Document or source from which more complete
17 information can be obtained” whenever a complete answer to a particular interrogatory is not
18 possible. Such a requirement is overbroad, unduly burdensome and not proportional to the
19 needs of this case, and it exceeds Plaintiff States’ obligations under the Federal Rules of Civil
20 Procedure—most notably, Fed. R. Civ. P. 26(b)(1).

21 8. Plaintiff States specifically object to the “relevant time period” set forth in
22 Instruction 22 (January 1, 2015 to the present). This time period is overbroad, unduly
23 burdensome, and seeks information that is not relevant to any party’s claim or defense in this
24 litigation and not proportional to the needs of this case. Unless otherwise stated, any responses
25 made pursuant to the Interrogatories will be limited to the time period of January 17, 2020 to
26 July 7, 2021.

9. Plaintiff States specifically object to Instruction 23. Defendants have no authority to demand a separate response from each Plaintiff State. Unless expressly stated, these are the collective responses and objections to the Interrogatories for all Plaintiff States.

SPECIFIC RESPONSES & OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 1:

1. Identify when and to whom Your Litigation Hold Notices in this case were issued, the categories of information and data that the recipients were instructed to preserve and collect, and the specific measures they were instructed to take to that end.

RESPONSE:

Plaintiff States object to this Interrogatory to the extent that it calls for information protected by the attorney-client privilege, the deliberative process privilege, the official information privilege, the common interest privilege, and/or the attorney work product doctrine, including information contained within internal communications and memoranda whose disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting deliberative process. Plaintiff States will not respond with respect to information that is protected by any of the above privileges.

Plaintiff States object to this Interrogatory to the extent that it calls for information that is not proportional to the needs of this case.

Plaintiff States object to this Interrogatory as premature, unduly burdensome and overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for completeness, and given that Defendants have not articulated any specific concern with Plaintiff States' document-preservation efforts.

Notwithstanding the above objections, Plaintiff States state as follows:

Defendants served their First Set of Requests to State Plaintiffs for Production of Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure, Plaintiff States served their responses and objections to those Requests on December 6, 2021, and Plaintiff States are now in the process of producing responsive documents.

Defendants have not identified any reason whatsoever to believe that Plaintiff States' productions will be incomplete or that Plaintiff States have failed to preserve all relevant and responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper, particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff States do not understand the Court's statements at the December 16, 2021, status conference to indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States' productions, Defendants are able to raise and substantiate legitimate document-preservation concerns, Plaintiff States will supplement this response.

INTERROGATORY NO. 2:

2. For each Potential Document Custodian, state whether they used Text Message or Chats for substantive business purposes related to the claims or allegations at issue in this litigation and Your basis for making that determination.

RESPONSE:

Plaintiff States object to this Interrogatory to the extent that it calls for information protected by the attorney-client privilege, the deliberative process privilege, the official information privilege, the common interest privilege, and/or the attorney work product doctrine, including information contained within internal communications and memoranda whose disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting deliberative process. Plaintiff States will not respond with respect to information that is protected by any of the above privileges.

Plaintiff States object to this Interrogatory to the extent that it calls for information that is not proportional to the needs of this case.

Plaintiff States object to this Interrogatory as premature, unduly burdensome and overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for completeness, and given that Defendants have not articulated any specific concern with Plaintiff States' document-preservation efforts.

1 Plaintiff States object to the definition of “Potential Document Custodian” as vague,
 2 ambiguous, overbroad, and unduly burdensome to the extent it applies to persons outside of
 3 units, departments, or subdivisions within the Offices of the Attorney General of each
 4 respective Plaintiff State that are responsible for enforcing the laws and claims asserted in this
 5 litigation, and to the extent it is premature for Plaintiff States to identify any custodians when
 6 the parties are continuing to engage in meet-and-confer negotiations as to the appropriate
 7 identification of Plaintiff States’ document production custodians.

8 Notwithstanding the above objections, Plaintiff States state as follows:

9 Defendants served their First Set of Requests to State Plaintiffs for Production of
 10 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
 11 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
 12 and Plaintiff States are now in the process of producing responsive documents.
 13 Defendants have not identified any reason whatsoever to believe that Plaintiff States’
 14 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
 15 responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper,
 16 particularly where Defendants have yet to fully evaluate Plaintiff States’ productions. Plaintiff
 17 States do not understand the Court’s statements at the December 16, 2021, status conference to
 18 indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States’
 19 productions, Defendants are able to raise and substantiate legitimate document-preservation
 20 concerns, Plaintiff States will supplement this response.

21 **INTERROGATORY NO. 3:**

22 3. Identify the date that each Litigation Hold Notice in this case was issued, including any
 23 reminder notices, and the means or methods by which such Notices were provided.

24 **RESPONSE:**

25 Plaintiff States object to this Interrogatory to the extent that it calls for information
 26 protected by the attorney-client privilege, the deliberative process privilege, the official
 27 information privilege, the common interest privilege, and/or the attorney work product doctrine,

1 including information contained within internal communications and memoranda whose
 2 disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting
 3 deliberative process. Plaintiff States will not respond with respect to information that is
 4 protected by any of the above privileges.

5 Plaintiff States object to this Interrogatory to the extent that it calls for information that
 6 is not proportional to the needs of this case.

7 Plaintiff States object to this Interrogatory as premature, unduly burdensome and
 8 overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for
 9 completeness, and given that Defendants have not articulated any specific concern with Plaintiff
 10 States' document-preservation efforts.

11 Notwithstanding the above objections, Plaintiff States state as follows:

12 Defendants served their First Set of Requests to State Plaintiffs for Production of
 13 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
 14 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
 15 and Plaintiff States are now in the process of producing responsive documents.
 16 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
 17 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
 18 responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper,
 19 particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff
 20 States do not understand the Court's statements at the December 16, 2021, status conference to
 21 indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States'
 22 productions, Defendants are able to raise and substantiate legitimate document-preservation
 23 concerns, Plaintiff States will supplement this response.

24 **INTERROGATORY NO. 4:**

25 4. For each Potential Document Custodian, state the start and end date, if applicable, of
 26 each litigation hold applicable to the Potential Document Custodian.

27 **RESPONSE:**

28 PLAINTIFF STATES' RESP. & OBJECT. TO
 DEFS.' PRESERVATION INTERROGATORIES

1 Plaintiff States object to this Interrogatory to the extent that it calls for information
2 protected by the attorney-client privilege, the deliberative process privilege, the official
3 information privilege, the common interest privilege, and/or the attorney work product doctrine,
4 including information contained within internal communications and memoranda whose
5 disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting
6 deliberative process. Plaintiff States will not respond with respect to information that is
7 protected by any of the above privileges.

8 Plaintiff States object to this Interrogatory to the extent that it calls for information that
9 is not proportional to the needs of this case.

10 Plaintiff States object to this Interrogatory as premature, unduly burdensome and
11 overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for
12 completeness, and given that Defendants have not articulated any specific concern with Plaintiff
13 States' document-preservation efforts.

14 Plaintiff States object to the definition of "Potential Document Custodian" as vague,
15 ambiguous, overbroad, and unduly burdensome to the extent it applies to persons outside of
16 units, departments, or subdivisions within the Offices of the Attorney General of each
17 respective Plaintiff State that are responsible for enforcing the laws and claims asserted in this
18 litigation, and to the extent it is premature for Plaintiff States to identify any custodians when
19 the parties are continuing to engage in meet-and-confer negotiations as to the appropriate
20 identification of Plaintiff States' document production custodians.

21 Notwithstanding the above objections, Plaintiff States state as follows:

22 Defendants served their First Set of Requests to State Plaintiffs for Production of
23 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
24 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
25 and Plaintiff States are now in the process of producing responsive documents.

26 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
27 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and

responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper, particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff States do not understand the Court's statements at the December 16, 2021, status conference to indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States' productions, Defendants are able to raise and substantiate legitimate document-preservation concerns, Plaintiff States will supplement this response.

INTERROGATORY NO. 5:

5. Describe with specificity all steps, measures, or actions You took to preserve or retain all relevant or potentially relevant Documents for this litigation, including any Text Message or Chats.

RESPONSE:

Plaintiff States object to this Interrogatory to the extent that it calls for information protected by the attorney-client privilege, the deliberative process privilege, the official information privilege, the common interest privilege, and/or the attorney work product doctrine, including information contained within internal communications and memoranda whose disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting deliberative process. Plaintiff States will not respond with respect to information that is protected by any of the above privileges.

Plaintiff States object to this Interrogatory to the extent that it calls for information that is not proportional to the needs of this case.

Plaintiff States object to this Interrogatory as premature, unduly burdensome and overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for completeness, and given that Defendants have not articulated any specific concern with Plaintiff States' document-preservation efforts.

Notwithstanding the above objections, Plaintiff States state as follows:

Defendants served their First Set of Requests to State Plaintiffs for Production of Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,

1 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
2 and Plaintiff States are now in the process of producing responsive documents.

3 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
4 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
5 responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper,
6 particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff
7 States do not understand the Court's statements at the December 16, 2021, status conference to
8 indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States'
9 productions, Defendants are able to raise and substantiate legitimate document-preservation
10 concerns, Plaintiff States will supplement this response.

11 **INTERROGATORY NO. 6:**

12 6. For each Potential Document Custodian, state whether any Text Message or Chats were
13 preserved during the relevant period governing the Litigation Hold Notices for this litigation
14 and the manner in which those Text Message or Chats were preserved, including through
15 enabling features that would preserve the history of those Text Message or Chats or by turning
16 off an auto-delete function.

17 **RESPONSE:**

18 Plaintiff States object to this Interrogatory to the extent that it calls for information
19 protected by the attorney-client privilege, the deliberative process privilege, the official
20 information privilege, the common interest privilege, and/or the attorney work product doctrine,
21 including information contained within internal communications and memoranda whose
22 disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting
23 deliberative process. Plaintiff States will not respond with respect to information that is
24 protected by any of the above privileges.

25 Plaintiff States object to this Interrogatory to the extent that it calls for information that
26 is not proportional to the needs of this case.

1 Plaintiff States object to this Interrogatory as premature, unduly burdensome and
 2 overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for
 3 completeness, and given that Defendants have not articulated any specific concern with Plaintiff
 4 States' document-preservation efforts.

5 Plaintiff States object to the definition of "Potential Document Custodian" as vague,
 6 ambiguous, overbroad, and unduly burdensome to the extent it applies to persons outside of
 7 units, departments, or subdivisions within the Offices of the Attorney General of each
 8 respective Plaintiff State that are responsible for enforcing the laws and claims asserted in this
 9 litigation, and to the extent it is premature for Plaintiff States to identify any custodians when
 10 the parties are continuing to engage in meet-and-confer negotiations as to the appropriate
 11 identification of Plaintiff States' document production custodians.

12 Notwithstanding the above objections, Plaintiff States state as follows:

13 Defendants served their First Set of Requests to State Plaintiffs for Production of
 14 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
 15 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
 16 and Plaintiff States are now in the process of producing responsive documents.

17 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
 18 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
 19 responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper,
 20 particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff
 21 States do not understand the Court's statements at the December 16, 2021, status conference to
 22 indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States'
 23 productions, Defendants are able to raise and substantiate legitimate document-preservation
 24 concerns, Plaintiff States will supplement this response.

25 **INTERROGATORY NO. 7:**

26 7. For each Potential Document Custodian, state whether any of the his or her Text
 27 Message or Chat files were destroyed or otherwise automatically deleted (a) on or after the date

1 on which You first anticipated litigation with Google identified in response to Interrogatory No.
2 8 or (b) during the pendency of the Litigation Hold Notices, and if so, whether all the Potential
3 Document Custodian's Text Message or Chat files were destroyed or otherwise deleted during
4 the pendency of the Litigation Hold Notices.

5 **RESPONSE:**

6 Plaintiff States object to this Interrogatory to the extent that it calls for information
7 protected by the attorney-client privilege, the deliberative process privilege, the official
8 information privilege, the common interest privilege, and/or the attorney work product doctrine,
9 including information contained within internal communications and memoranda whose
10 disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting
11 deliberative process. Plaintiff States will not respond with respect to information that is
12 protected by any of the above privileges.

13 Plaintiff States object to this Interrogatory to the extent that it calls for information that
14 is not proportional to the needs of this case.

15 Plaintiff States object to this Interrogatory as premature, unduly burdensome and
16 overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for
17 completeness, and given that Defendants have not articulated any specific concern with Plaintiff
18 States' document-preservation efforts.

19 Plaintiff States object to the definition of "Potential Document Custodian" as vague,
20 ambiguous, overbroad, and unduly burdensome to the extent it applies to persons outside of
21 units, departments, or subdivisions within the Offices of the Attorney General of each
22 respective Plaintiff State that are responsible for enforcing the laws and claims asserted in this
23 litigation, and to the extent it is premature for Plaintiff States to identify any custodians when
24 the parties are continuing to engage in meet-and-confer negotiations as to the appropriate
25 identification of Plaintiff States' document production custodians.

26 Notwithstanding the above objections, Plaintiff States state as follows:
27

Defendants served their First Set of Requests to State Plaintiffs for Production of Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure, Plaintiff States served their responses and objections to those Requests on December 6, 2021, and Plaintiff States are now in the process of producing responsive documents.

Defendants have not identified any reason whatsoever to believe that Plaintiff States' productions will be incomplete or that Plaintiff States have failed to preserve all relevant and responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper, particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff States do not understand the Court's statements at the December 16, 2021, status conference to indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States' productions, Defendants are able to raise and substantiate legitimate document-preservation concerns, Plaintiff States will supplement this response.

INTERROGATORY NO. 8:

8. Identify the date and describe with specificity the circumstances in which You first anticipated litigation with Google.

RESPONSE:

Plaintiff States object to this Interrogatory to the extent that it calls for information protected by the attorney-client privilege, the deliberative process privilege, the official information privilege, the common interest privilege, and/or the attorney work product doctrine, including information contained within internal communications and memoranda whose disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting deliberative process. Plaintiff States will not respond with respect to information that is protected by any of the above privileges.

Plaintiff States object to this Interrogatory to the extent that it calls for information that is not proportional to the needs of this case.

Plaintiff States object to this Interrogatory as premature, unduly burdensome and overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for

completeness, and given that Defendants have not articulated any specific concern with Plaintiff States' document-preservation efforts.

Notwithstanding the above objections, Plaintiff States state as follows:

Defendants served their First Set of Requests to State Plaintiffs for Production of Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure, Plaintiff States served their responses and objections to those Requests on December 6, 2021, and Plaintiff States are now in the process of producing responsive documents.

Defendants have not identified any reason whatsoever to believe that Plaintiff States' productions will be incomplete or that Plaintiff States have failed to preserve all relevant and responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper, particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff States do not understand the Court's statements at the December 16, 2021, status conference to indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States' productions, Defendants are able to raise and substantiate legitimate document-preservation concerns, Plaintiff States will supplement this response.

INTERROGATORY NO. 9:

9. Describe with specificity the employees, custodians, systems, and other locations of documents for which You ceased, paused, or altered Your Document Retention policies, schedules, practices, or procedures in anticipation or as a result of litigation with Google and specify the date on which such suspension occurred for each.

RESPONSE:

Plaintiff States object to this Interrogatory to the extent that it calls for information protected by the attorney-client privilege, the deliberative process privilege, the official information privilege, the common interest privilege, and/or the attorney work product doctrine, including information contained within internal communications and memoranda whose disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting

1 deliberative process. Plaintiff States will not respond with respect to information that is
2 protected by any of the above privileges.

3 Plaintiff States object to this Interrogatory to the extent that it calls for information that
4 is not proportional to the needs of this case.

5 Plaintiff States object to this Interrogatory as premature, unduly burdensome and
6 overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for
7 completeness, and given that Defendants have not articulated any specific concern with Plaintiff
8 States' document-preservation efforts.

9 Notwithstanding the above objections, Plaintiff States state as follows:

10 Defendants served their First Set of Requests to State Plaintiffs for Production of
11 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
12 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
13 and Plaintiff States are now in the process of producing responsive documents.

14 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
15 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
16 responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper,
17 particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff
18 States do not understand the Court's statements at the December 16, 2021, status conference to
19 indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States'
20 productions, Defendants are able to raise and substantiate legitimate document-preservation
21 concerns, Plaintiff States will supplement this response.

22 **INTERROGATORY NO. 10:**

23 10. Describe with specificity the measures You took to comply with Your policies,
24 schedules, practices or procedures, for Document Retention and Litigation Hold Notices, if any,
25 that were implemented by You (or on behalf of You) once You anticipated this lawsuit. The
26 response should identify the date(s) that each Litigation Hold Notice or Document Retention
27 measure was implemented.

RESPONSE:

Plaintiff States object to this Interrogatory to the extent that it calls for information protected by the attorney-client privilege, the deliberative process privilege, the official information privilege, the common interest privilege, and/or the attorney work product doctrine, including information contained within internal communications and memoranda whose disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting deliberative process. Plaintiff States will not respond with respect to information that is protected by any of the above privileges.

Plaintiff States object to this Interrogatory to the extent that it calls for information that is not proportional to the needs of this case.

Plaintiff States object to this Interrogatory as premature, unduly burdensome and overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for completeness, and given that Defendants have not articulated any specific concern with Plaintiff States' document-preservation efforts.

Notwithstanding the above objections, Plaintiff States state as follows:

Defendants served their First Set of Requests to State Plaintiffs for Production of Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure, Plaintiff States served their responses and objections to those Requests on December 6, 2021, and Plaintiff States are now in the process of producing responsive documents.

Defendants have not identified any reason whatsoever to believe that Plaintiff States' productions will be incomplete or that Plaintiff States have failed to preserve all relevant and responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper, particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff States do not understand the Court's statements at the December 16, 2021, status conference to indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States' productions, Defendants are able to raise and substantiate legitimate document-preservation concerns, Plaintiff States will supplement this response.

INTERROGATORY NO. 11:

11. Describe with specificity the steps You took to determine the sources, including which Potential Document Custodians, that might possess Documents, including Text Message and Chats, relevant to this litigation, what Documents would be relevant, and any efforts to suspend or amend Document Retention policies, schedules, practices, or procedures with respect to those Documents.

RESPONSE:

Plaintiff States object to this Interrogatory to the extent that it calls for information protected by the attorney-client privilege, the deliberative process privilege, the official information privilege, the common interest privilege, and/or the attorney work product doctrine, including information contained within internal communications and memoranda whose disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting deliberative process. Plaintiff States will not respond with respect to information that is protected by any of the above privileges.

Plaintiff States object to this Interrogatory to the extent that it calls for information that is not proportional to the needs of this case.

Plaintiff States object to this Interrogatory as premature, unduly burdensome and overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for completeness, and given that Defendants have not articulated any specific concern with Plaintiff States' document-preservation efforts.

Plaintiff States object to the definition of "Potential Document Custodian" as vague, ambiguous, overbroad, and unduly burdensome to the extent it applies to persons outside of units, departments, or subdivisions within the Offices of the Attorney General of each respective Plaintiff State that are responsible for enforcing the laws and claims asserted in this litigation, and to the extent it is premature for Plaintiff States to identify any custodians when the parties are continuing to engage in meet-and-confer negotiations as to the appropriate identification of Plaintiff States' document production custodians.

1 Notwithstanding the above objections, Plaintiff States state as follows:

2 Defendants served their First Set of Requests to State Plaintiffs for Production of
3 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
4 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
5 and Plaintiff States are now in the process of producing responsive documents.

6 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
7 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
8 responsive materials. Defendants have not identified any reason whatsoever to believe that
9 Plaintiff States' productions will be incomplete or that Plaintiff States have failed to preserve all
10 relevant and responsive materials. Absent any such basis, serving an Interrogatory of this kind
11 is improper, particularly where Defendants have yet to fully evaluate Plaintiff States'
12 productions. Plaintiff States do not understand the Court's statements at the December 16,
13 2021, status conference to indicate otherwise. If, in the future, after Defendants have actually
14 evaluated Plaintiff States' productions, Defendants are able to raise and substantiate legitimate
15 document-preservation concerns, Plaintiff States will supplement this response.

16 **INTERROGATORY NO. 12:**

17 12. Describe with specificity Your Document Retention policies, schedules, practices or
18 procedures, in effects from 2015 to the present.

19 **RESPONSE:**

20 Plaintiff States object to this Interrogatory to the extent that it calls for information
21 protected by the attorney-client privilege, the deliberative process privilege, the official
22 information privilege, the common interest privilege, and/or the attorney work product doctrine,
23 including information contained within internal communications and memoranda whose
24 disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting
25 deliberative process. Plaintiff States will not respond with respect to information that is
26 protected by any of the above privileges.

1 Plaintiff States object to this Interrogatory to the extent that it calls for information that
2 is not proportional to the needs of this case.

3 Plaintiff States object to this Interrogatory as duplicative of Defendants' Request for
4 Production No. 66.

5 Plaintiff States object to this Interrogatory as premature, unduly burdensome and
6 overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for
7 completeness, and given that Defendants have not articulated any specific concern with Plaintiff
8 States' document-preservation efforts.

9 Notwithstanding the above objections, Plaintiff States state as follows:

10 Defendants served their First Set of Requests to State Plaintiffs for Production of
11 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
12 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
13 and Plaintiff States are now in the process of producing responsive documents. In particular, as
14 relevant here, Plaintiff States are currently engaged in meet-and-confer negotiations over
15 Requests that may be responsive to this Interrogatory (*e.g.*, RFP No. 66).

16 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
17 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
18 responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper,
19 particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff
20 States do not understand the Court's statements at the December 16, 2021, status conference to
21 indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States'
22 productions, Defendants are able to raise and substantiate legitimate document-preservation
23 concerns, Plaintiff States will supplement this response.

24 **INTERROGATORY NO. 13:**

25 13. State Your Text Message and Chat retention policy and any other related policies You
26 had in place during the date range identified in response to Interrogatory No. 4.

27 **RESPONSE:**

28 PLAINTIFF STATES' RESP. & OBJECT. TO
DEFS.' PRESERVATION INTERROGATORIES

1 Plaintiff States object to this Interrogatory to the extent that it calls for information
2 protected by the attorney-client privilege, the deliberative process privilege, the official
3 information privilege, the common interest privilege, and/or the attorney work product doctrine,
4 including information contained within internal communications and memoranda whose
5 disclosure would reveal attorneys' thought processes and pre-decisional documents reflecting
6 deliberative process. Plaintiff States will not respond with respect to information that is
7 protected by any of the above privileges.

8 Plaintiff States object to this Interrogatory to the extent that it calls for information that
9 is not proportional to the needs of this case.

10 Plaintiff States object to this Interrogatory as duplicative of Defendants' Request for
11 Production No. 66.

12 Plaintiff States object to this Interrogatory as premature, unduly burdensome and
13 overbroad, given that Defendants have not yet begun to evaluate Plaintiff States' production for
14 completeness, and given that Defendants have not articulated any specific concern with Plaintiff
15 States' document-preservation efforts.

16 Notwithstanding the above objections, Plaintiff States state as follows:

17 Defendants served their First Set of Requests to State Plaintiffs for Production of
18 Documents on November 5, 2021. In accordance with the Federal Rules of Civil Procedure,
19 Plaintiff States served their responses and objections to those Requests on December 6, 2021,
20 and Plaintiff States are now in the process of producing responsive documents. In particular, as
21 relevant here, Plaintiff States are currently engaged in meet-and-confer negotiations over
22 Requests that may be responsive to this Interrogatory (*e.g.*, RFP No. 66).

23 Defendants have not identified any reason whatsoever to believe that Plaintiff States'
24 productions will be incomplete or that Plaintiff States have failed to preserve all relevant and
25 responsive materials. Absent any such basis, serving an Interrogatory of this kind is improper,
26 particularly where Defendants have yet to fully evaluate Plaintiff States' productions. Plaintiff
27 States do not understand the Court's statements at the December 16, 2021, status conference to

indicate otherwise. If, in the future, after Defendants have actually evaluated Plaintiff States' productions, Defendants are able to raise and substantiate legitimate document-preservation concerns, Plaintiff States will supplement this response.

January 14, 2022

Respectfully submitted,

By: /s/ Sarah G. Boyce

Brendan Glackin (SBN 199643)
 bglackin@agutah.gov
 David N. Sonnenreich (*pro hac vice*)
 dsonnenreich@agutah.gov
 Scott R. Ryther (*pro hac vice*)
 sryther@agutah.gov
UTAH OFFICE OF THE
ATTORNEY GENERAL
 160 East 300 South, Fifth Floor
 P.O. Box 140874
 Salt Lake City, UT 84114
 Telephone: (801) 366-0375

Sarah G. Boyce (*pro hac vice*)
 sboyce@ncdoj.gov
 Jonathan Marx (*pro hac vice*)
 jmarx@ncdoj.gov
 Jessica V. Sutton (*pro hac vice*)
 jsutton2@ncdoj.gov
NORTH CAROLINA DEPARTMENT
OF JUSTICE
 P.O. Box 628
 Raleigh, NC 27602
 Telephone: (919) 716-6000

Bryan L. Bloom (*pro hac vice*)
 Bryan.Bloom@ag.ny.gov
NEW YORK STATE OFFICE OF THE
ATTORNEY GENERAL
 28 Liberty Street
 New York, NY 10005
 Telephone: (212) 416-8262

S. Ethan Bowers (*pro hac vice*)
 Ethan.Bowers@ag.tn.gov
TENNESSEE OFFICE OF THE
ATTORNEY GENERAL
 P.O. Box 20207
 Nashville, TN 37202
 Telephone: (615) 741-8722

Attorneys for the Plaintiff States

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Utah, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 14th day of January 2022.

s/Scott R. Ryther
Scott R. Ryther
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of New York, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 10th day of January 2022.

/s/ Bryan Bloom
Bryan L. Bloom
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of North Carolina, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 10th day of January 2022.

/s/ Jessica V. Sutton

Jessica V. Sutton

Special Deputy Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Tennessee, by and through its Attorney General and Reporter, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 13th day of January 2022.

/s S. Ethan Bowers

S. Ethan Bowers
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Arizona, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this ____ day of January 2022.

/s/ Christopher Slood
Christopher M. Slood
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Colorado, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 11th day of January 2022.

/s/ Diane R. Hazel
Diane R. Hazel
First Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Iowa, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Max M. Miller

Max M. Miller

Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Nebraska, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12 day of January 2022.

/s/ Joseph M. Conrad

Joseph M. Conrad
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Alaska, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 13th day of January 2022.

/s/ Jeff Pickett

Jeff Pickett

Senior Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Arkansas, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Johnathan R. Carter

Johnathan R. Carter
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of California, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Adam Miller

Adam Miller
Deputy Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Connecticut, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 7th day of January 2022.



Jeremy Pearlman
Deputy Associate Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Delaware, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 11th day of January 2022.

/s/ Michael A. Undorf
Michael A. Undorf
Deputy Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff District of Columbia, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Kathleen Konopka
Kathleen Konopka
Deputy Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Florida, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

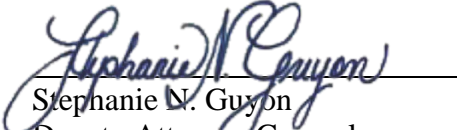
Executed under penalty of perjury this 6th day of January 2022.

/s Lee Istrail
Lee Istrail
Assistant Attorney General, Antitrust Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Idaho, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 7th day of January 2022.


Stephanie N. Guyon
Deputy Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Indiana, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Matthew Michaloski
Matthew Michaloski
Deputy Attorney General
Consumer Protection Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff Commonwealth of Kentucky, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Philip R. Heleringer

Philip R. Heleringer

Deputy Executive Director of Consumer Protection

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Louisiana, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 13 day of January 2022.

s/Patrick Voelker

Patrick Voelker

Assistant Attorney General

Public Protection Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Maryland, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 7th day of January 2022.

/s/ Schonette J. Walker
Schonette J. Walker
Assistant Attorney General
Chief, Antitrust Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff Commonwealth of Massachusetts, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ William T. Matlack
William T. Matlack
Assistant Attorney General
Chief, Antitrust Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Minnesota, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 13 day of January 2022.

/s/ Justin Moor

Justin Moor
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Mississippi, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this ____ day of January 2022.

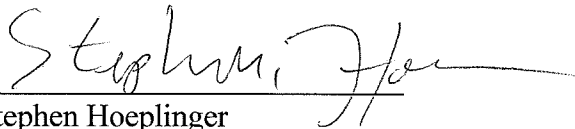
_____/s/ Hart Martin

Hart Martin
Assistant Attorney General
Consumer Protection Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Missouri, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.


Stephen Hoeplinger
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Montana, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 11th day of January 2022.

/s/ Rebekah J. French

Rebekah J. French
Assistant Attorney General
Office of Consumer Protection
Montana Department of Justice

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Nevada, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Michelle C. Newman
Michelle C. Newman
Senior Deputy Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of New Hampshire, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Alexandra C. Sosnowski
Alexandra C. Sosnowski
Attorney
Consumer Protection and Antitrust Bureau

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of New Jersey, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

/s/ Yale A. Leber

Yale A. Leber

Deputy Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of New Mexico, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 13th day of January 2022.

/s/Judith E. Paquin

Judith E. Paquin

Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of North Dakota, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 11th day of January 2022.

/s/ Elin S. Alm

Elin S. Alm
Assistant Attorney General
Consumer Protection and Antitrust Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Oklahoma, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 13 day of January 2022.



Caleb J. Smith
Assistant Attorney General
Consumer Protection Unit

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Oregon, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

s/ Timothy D. Smith

Timothy D. Smith
Senior Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Rhode Island, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 11th day of January 2022.

/s/ Stephen N. Provazza
Stephen N. Provazza
Special Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of South Dakota, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

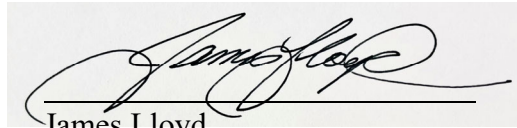
Executed under penalty of perjury this 12th day of January 2022.

/s/ Yvette K. Lafrentz
Yvette K. Lafrentz
Assistant Attorney General
Consumer Protection Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Texas, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 12th day of January 2022.

A handwritten signature in black ink, appearing to read "James Lloyd", is written over a horizontal line.

James Lloyd
Chief, Antitrust Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Vermont, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 13th day of January 2022.

/s/ Ryan Kriger

Ryan Kriger
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff Commonwealth of Virginia, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 11 day of January 2022.

/s/ Tyler T. Henry
Tyler T. Henry
Assistant Attorney General

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of Washington, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

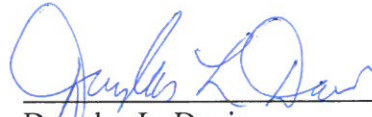
Executed under penalty of perjury this 11th day of January 2022.

/s/ Nathaniel M. Hopkin
Nathaniel M. Hopkin
Assistant Attorney General
Antitrust Division

DECLARATION AND VERIFICATION

I am an attorney for the Plaintiff State of West Virginia, by and through its Attorney General, in the above-entitled action. I have read the Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories to Plaintiff States. I hereby verify and declare under penalty of perjury that the foregoing responses are true and correct according to the best of my knowledge, information, and belief.

Executed under penalty of perjury this 11th day of January 2022.



Douglas L. Davis
Senior Assistant Attorney General

CERTIFICATE OF SERVICE

The undersigned certifies that on January 14, 2022, a true and correct copy of the foregoing Plaintiff States' Responses and Objections to Defendants' Preservation Interrogatories was served via email to the following:

Karma M. Giulianelli (SBN 184175)
karma.giulianelli@bartlitbeck.com

BARTLIT BECK LLP
1801 Wewetta St., Suite 1200
Denver, Colorado 80202
Telephone: (303) 592-3100

Hae Sung Nam (*pro hac vice*)
hnam@kaplanfox.com

KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue
New York, NY 10022
Tel.: (212) 687-1980

*Co-Lead Counsel for the Proposed Class in
In re Google Play Consumer Antitrust
Litigation*

Steve W. Berman (*pro hac vice*)
steve@hbsslaw.com

**HAGENS BERMAN SOBOL SHAPIRO
LLP**

1301 Second Ave., Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292

Eamon P. Kelly (*pro hac vice*)
ekelly@sperling-law.com

SPERLING & SLATER P.C.
55 W. Monroe, Suite 3200
Chicago, IL 60603
Telephone: 312-641-3200

*Co-Lead Counsel for the Proposed Class in
In re Google Play Developer Antitrust
Litigation and Attorneys for Pure Sweat
Basketball, Inc.*

Bonny E. Sweeney (SBN 176174)
bsweeney@hausfeld.com

HAUSFELD LLP
600 Montgomery Street, Suite 3200
San Francisco, CA 94104
Telephone: (415) 633-1908

*Co-Lead Counsel for the Proposed Class in
In re Google Play Developer Antitrust
Litigation and Attorneys for Peekya App
Services, Inc.*

Paul J. Riehle (SBN 115199)
paul.riehle@faegredrinker.com

**FAEGRE DRINKER BIDDLE & REATH
LLP**

Four Embarcadero Center, 27th Floor
San Francisco, CA 94111
Telephone: (415) 591-7500

Christine A. Varney (*pro hac vice*)
cvarney@cravath.com

CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, New York 10019
Telephone: (212) 474-1000

*Counsel for Plaintiff Epic Games, Inc. in
Epic Games, Inc. v. Google LLC et al.*

Brian C. Rocca (SBN 221576)
brian.rocca@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

1 Daniel M. Petrocelli (SBN 97802)
2 dpetrocelli@omm.com
3 **O'MELVENY & MYERS LLP**
4 1999 Avenue of the Stars, 7th Fl.
5 Los Angeles, CA 90067-6035
6 Telephone: (310) 553-6700

Glenn D. Pomerantz (SBN 97802)
glenn.pomerantz@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071-3426
Telephone: (213) 683-9100

Counsel for Defendants Google LLC et al

7 I certify under penalty of perjury that the foregoing is true and correct.

8 /s/ Sarah G. Boyce
9 Sarah G. Boyce